IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOSEPH FRIEL, individually and

on behalf of a class of all persons and : Case No. 3:24-cv-01866-JKM

entities similarly situated,

(Judge Julia K. Munley)

Plaintiff(s),

:

v.

:

LINE 5, LLC; HEADSTART
WARRANTY GROUP LLC; and
JEA MANAGEMENT SERVICS
d/b/a COVERED AUTO,

:

Defendant(s). :

DEFENDANT LINE 5, LLC'S CONSENT MOTION FOR AN EXTENSION OF TIME TO FILE ITS RESPONSE TO PLAINTIFF'S COMPLAINT

Defendant Line 5, LLC ("Line 5") respectfully requests, with the consent of Plaintiff, that the Court grant an extension of time to file its response to Plaintiff's Complaint, ECF 1, and, in support thereof, avers as follows:

- 1. On or about October 29, 2024, Plaintiff filed his Complaint See ECF 1.
- 2. Line 5 was served with the Complaint on or about October 31, 2024. See ECF 8.
- 3. Line 5's Response to Plaintiff's Complaint is currently due on November 21, 2024.

- 4. The undersigned counsel was retained by Line 5 on Friday, November 15, 2024.
- 5. The undersigned counsel is currently scheduled to be out of the office from November 20, 2024, December 4, 2024, for a previously scheduled medical procedure.
- 6. Defendant's counsel respectfully requests an extension of time, up to and including, December 13, 2024, to file its response to Plaintiff's Complaint.
- 7. Defendant has not previously sought an extension for time to respond to Plaintiff's Complaint.
- 8. Plaintiff's Counsel consented to this Motion on November 18, 2024, via e-mail.
 - 9. This Motion is made in good faith and not for the purpose of delay.
 - 10. This Motion is made without waiving any defenses.

WHEREFORE, Defendant Line 5, LLC requests an extension, up to and including, December 13, 2024, to file its Answer or otherwise respond to Plaintiff's Complaint.

Respectfully submitted,

BARRON & NEWBURGER, P.C.

By: /s/ Brit J. Suttell
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Counsel for Defendant Line 5, LLC

Dated: November 18, 2024

CERTIFICATE OF SERVICE

I certify that on November 18, 2024, a true copy of the foregoing document was served on all counsel of record via CM/ECF.

BARRON & NEWBURGER, P.C.

By: /s/ Brit J. Suttell

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